

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CHRISTINE SARACENI,

Plaintiff,

v.

Case No.: 19-CV-1152

M&T BANK CORPORATION,

Defendant.

**DECLARATION OF JODYANN GALVIN
IN SUPPORT OF MOTION TO SHORTEN TIME**

Jodyann Galvin, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declares the following to be true and correct:

1. I am an attorney at Hodgson Russ LLP, counsel for Defendant M&T Bank Corporation (“M&T”). I submit this declaration in support of M&T’s motion to shorten time on M&T’s motion to seal and cross-motion for preliminary injunction.

2. This Court has set a schedule for M&T’s original sealing motion and reconsideration. Dkt. No. 26. Plaintiff’s papers are due on October 16, 2019 and replies, if any, are due on October 18, 2019. Shortening the time on M&T’s motion to seal is sensible and practical given that: (1) the issues raised are largely the same as the prior motion; and (2) Ms. Saraceni has moved at the Second Circuit to stay this Court’s prior interim sealing order on an emergency basis and has requested a return date on October 22, 2019. To have these issues related to sealing considered together would promote efficiency and judicial economy.

3. The shortening of time for M&T's cross-motion for preliminary injunction should be granted for similar reasons. Plaintiff's motion and M&T's cross-motion both address Ms. Saraceni's conduct, M&T's conduct, The Severance Agreement, and M&T's policies. Therefore, hearing these issues together conserves judicial resources and permits a full airing of the issues. M&T's proposed schedule would be to have plaintiff's opposition due on the same day as its reply on preliminary injunction, October 16, 2019 and M&T's reply, if any, due on October 22.¹ This would enable the court to keep the argument on October 28, 2019.

Dated: October 9, 2019

s/Jodyann Galvin
Jodyann Galvin

¹ M&T's answer to the Amended Complaint and replies on its motion to seal are due on October 18, 2019, so it respectfully seeks an additional two business days to prepare any reply, if needed.